Remarks / Arguments

Claims 1-16 are currently pending in this application.

1.   Claim Rejections

Claims 1-16 were rejected under 35 U.S.C. § 102(e) as being anticipated by Qi et al. (U.S. Patent Application No. 2004/0215784; hereinafter "Qi"). Qi relates to a distributed management method of a collaboration session which involves local and distant servers.

The Applicant respectfully asserts that Qi does not anticipate claims 1-16. In order for a reference to anticipate a claim, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." MPEP § 2131 (quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)). Each and every element recited in the claim must be found in a single reference. *Id.* (citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). Qi does not anticipate claims 1-16, because Qi does not disclose all of the features recited in the claims.

Claim 1 recites the step of "the reception (E500), by the messaging system associated with the collaboration session manager, of a message generated by a collaboration session client, the message comprising a plurality of addresses of clients of the collaboration session." There is no disclosure, teaching, or suggestion of this step in Qi. Instead, in the method disclosed in Qi, a **request** for establishing a collaboration session, including a list of invitees, is sent by a user to a local server. *See e.g.* Qi, claim 20 ("said request initiated by a first user associated with a local server and including a list of invitees").

The "request" described in Qi differs from the "message" of claim 1 of the present application. In paragraph [0023], Qi states that "the user of client computer 206 has initiated a request to schedule a collaboration session and transmitted that request through the network communication means 207 to the CSM 301 residing on the server computer 201." Qi includes no teaching that would indicate that the "request" which is sent by the user is a "message."

Furthermore, in paragraph [0028], Qi states that "[t]he request is preferably **generated** by the user **accessing a web page** hosted by the local server 201, providing a unique user identification, and selecting one of the scheduled collaboration sessions indicated thereon that is

identified by a collaboration session subject and start time." (Emphasis added.) This disclosure clearly shows that the request of Qi is not a message, but the filling in, and the selection of, information on a web page. It is the Applicant's position that such a request cannot be a message directed to a messaging system. In fact, the "request" of Qi would more likely be an insertion, in a database, of records to create a collaboration session.

Therefore, the method disclosed in Qi does not anticipate the invention of claim 1 because the method of Qi does not include the step of "the reception, (E500), by the messaging system associated with the collaboration session manager, of a message generated by a collaboration session client, the message comprising a plurality of addresses of clients of the collaboration session." Moreover, Qi contains no disclosure, teaching, or suggestion of a method utilizing a messaging system to receive messages from a user. For example, Qi does not disclose, teach, or suggest a "messaging system" comprising technical features which allow the sending and receiving of messages that follow the RFC standards of the Internet Message Format (e.g. RFC 2822 and RFC 5322).

The Applicant also respectfully notes that the invention of claim 1 is not rendered obvious by Qi. As stated in the MPEP, for an invention to be obvious, "[t]he gap between the prior art and the claimed invention may not be 'so great as to render the [claim] nonobvious to one reasonably skilled in the art.'" MPEP § 2141 (citing *Dann v. Johnston*, 425 U.S. 219, 230 (1976)). The difference between the invention of claim 1 and Qi is so great as to render claim 1 nonobvious to one of ordinary skill in the art.

The present invention relates to a system which eases the technical process of establishing a collaboration session between a plurality of clients. To achieve this result, the invention allows a client to send a message to a messaging system which is associated with a collaboration session manager. The messaging system is able to receive the message transmitted by one of the clients, and the collaboration session manager can notify the plurality of clients of the collaboration session of the activation of the collaboration session. Indeed, the plurality of clients of the collaboration session are not required to accomplish complicated technical manipulations to access the collaboration session.

As discussed above, the invention of claim 1, unlike the method of Qi, uses a message generated by a collaboration session client. This difference is significant because the use of a message generated by a collaboration session client simplifies the establishment of a

collaboration session. Indeed, a problem solved by the invention of claim 1 could be stated as: "How can the generation of a collaboration session be simplified?" Specifically, the invention simplifies the creation of a collaboration session for the user. It also simplifies the reception of information by a session activation device 120, through the use of a messaging server 110.

Furthermore, the Applicant does not understand the arguments of the Examiner, who states that "the Messaging system 122 and the Manager 125 are simply software that make up a portion of device 120," to demonstrate that the CSM includes the software as required by claim 1. This was not the object of the previous argument of the Applicant, who apologizes for any confusion. As stated in paragraph [0144] of the present application, the message is transferred to the messaging server 110. The messaging server then transmits the message to device 120. This is clearly a difference between the present invention and Qi, and is an advantage of the present invention.

Therefore, the transmission of a message to a messaging server 110 (which is not a part of session activation device 120) facilitates the creation of a simpler session activation device, which comprises a messaging system 122 (to receive and send messages) and not a messaging server. The integration of such a messaging client 122 is advantageous because a messaging client was a widely distributed and well-known piece of software at the time of the present invention.

Accordingly, claim 1 is inventive.

As previously stated, claim 1 is not anticipated by Qi. Claims 2-6 are dependent on claim 1; therefore, claims 2-6 are also not anticipated by Qi.

With regard to claim 6, the Examiner has revised his position. Claim 6 now stands rejected as being anticipated by Qi.

The Applicant respectfully disagrees with the position of the Examiner. In paragraph [0026], Qi states that the invitations transmitted to the users invited to the collaboration session include: the subject of the session, the start time, a URL to be used to access the collaboration session, and, optionally, a collaboration session number or code. In paragraph [0030], Qi states that "[i]f a collaboration session identification number or code is provided to invitees, the methods . . . may be modified by confirming whether a collaboration session identification number or code provided by a user with a collaboration session participation request is the correct identification number or code for that collaboration session, instead of checking user

identifications against the local server, remote server and direct lists." However, in the next sentence, Qi discloses: "This allows a 'backdoor' entry into the collaboration session by users inadvertently omitted from the original invitee list. Although such a method may be simpler to implement and is fully contemplated to be within the scope of the present invention, it is not the preferred method for security reasons, because it does not prevent improper 'eavesdropping' or 'spying' on the collaboration session by users stealing or otherwise obtaining improper access to the collaboration session identification number or code."

It is the Applicant's position that these statements in Qi's disclosure demonstrate that the collaboration session number or code of Qi is not an "accreditation" as recited in claim 6. The "accreditations" of claim 6 are allocated so that "access to a collaboration session is made secure." *See* Present Application, paragraph [0034]. In fact, an "accreditation" of the present invention has the common meaning of an accreditation (that is, the right to do something), which supposes a verification of this right. In contrast, using a collaboration number or code in Qi allows "a 'backdoor' entry into the collaboration session by users inadvertently omitted from the original invitee list." *See* Qi, paragraph [0030]. Therefore, as acknowledged in paragraph [0030], the collaboration number or code in Qi "does not prevent improper 'eavesdropping' or 'spying,'" and, consequently, does not make access to a collaboration session secure. The "backdoor" allowed by Qi demonstrates that there is no verification of the right of the user to access the collaboration session.

Consequently, the collaboration session number or code of Qi is not the "accreditation" recited in claim 6. For this reason, and for the reasons that Qi does not anticipate claim 1, claim 6 is not anticipated by Qi.

Claim 7 recites the step of "the reception, by a messaging system (101) associated with a client of the collaboration session, at least one message generated by a **messaging system** associated with a collaboration session manager, the message comprising the identifier of an activated collaboration service." (Emphasis added.) As discussed above in relation to claim 1, the session activation device 120 comprises a messaging system 122 (to receive and send messages), and not a messaging server 110. This messaging system 122 is associated with a collaboration session manager. Qi does not disclose, teach, or suggest the messaging system associated with a collaboration session manager that is recited in claim 7.

Therefore, the method disclosed in Qi does not anticipate the invention of claim 7, because the method of Qi does not include the step of "the reception, by a messaging system (101) associated with a client of the collaboration session, at least one message generated by a messaging system associated with a collaboration session manager, the message comprising the identifier of an activated collaboration service." Claims 8-11 are dependent on claim 7; therefore, claims 8-11 are also not anticipated by Qi.

Claims 12, 13, and 14 are not anticipated by Qi for reasons similar to those discussed above in regard to claims 1 and 7.

Claim 15 is not anticipated by Qi because it is directed to a computer program containing instructions for implementing the method of claim 1, which is not anticipated by Qi.

Claim 16 is not anticipated by Qi because it is directed to a computer program containing instructions for implementing the method of claim 7, which is also not anticipated by Qi.

**2.   Request for Reconsideration and Allowance**

Based upon the above Remarks, claims 1-16 are believed to be in proper form for allowance, and patentable over the prior art made of record. Applicant respectfully requests reconsideration of these claims and the issuance of a Notice of Allowance.

Please direct any questions or comments regarding this application to the undersigned.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 02-3732.

Respectfully submitted,

Dated: 4 May 09
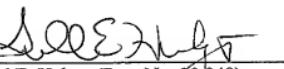
By _____
Gerald E. Helget (Reg. No. 30,948)
Audrey J. Babcock (Reg. No. 57,702)
BRIGGS AND MORGAN, P.A.
2200 IDS Center, 80 South Eighth Street
Minneapolis, MN 55402
Telephone: 612-977-8480
Facsimile: 612-977-8650